

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
AT KANSAS CITY**

CRAIG ADAMS,)	
)	
Plaintiffs,)	
)	
v.)	Case No.
)	
CITY OF KANSAS CITY, MISSOURI,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendants City of Kansas City, Missouri, pursuant to 28 U.S.C. §§ 1441 and 1446, gives notice of removal of this action to the United States District Court for the Western District of Missouri, from the Circuit Court of Jackson County, Missouri at Kansas City. The grounds for removal are:

1. Plaintiff filed a petition styled *Craig Adams v. City of Kansas City, Missouri*, Case No. 1916-CV01667, in the Circuit Court of Jackson County, Missouri, on January 10, 2019.
2. On January 24, 2019, the Office of the City Attorney accepted service for defendant City of Kansas City, Missouri.
3. Plaintiff's petition is a civil action that includes state law claims and federal claims made pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201, *et. seq.*
4. Removal is proper because these claims arise under federal law and are ones in which the U.S. District Court has original jurisdiction.
5. The U.S. District Court for the Western District of Missouri is the appropriate court for filing of a notice of removal from the Circuit Court of Jackson County, Missouri where the action was commenced and is pending.

6. Accordingly, the defendant seeks to remove this action to the U.S. District Court for the Western District of Missouri.
7. Thirty days have not expired since defendants were served with a copy of the summons and petition.
8. Immediately upon filing this notice of removal, defendants will file a copy of this notice with the clerk of the Circuit Court of Jackson County, Missouri and provide written notice to Plaintiff.
9. Copies of all process, pleadings, and orders served upon the defendants in the action are attached. (Exhibit B)
10. Removing this action to federal court does not indicate an admission of any of the averments or allegations made by Plaintiff, nor does it waive the right to assert any and all defenses.

WHEREFORE, defendant City of Kansas City, Missouri, gives notice of the removal of this action from the Circuit Court of Jackson County, Missouri to this Court.

Respectfully submitted,

OFFICE OF THE CITY ATTORNEY

By: /s/Tara M. Kelly
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**ATTORNEY FOR DEFENDANT CITY OF
KANSAS CITY, MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2019 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system electronic notification system, and also mailed the foregoing to:

John B. Boyd
Boyd Kenter Thomas & Parrish, LLC
221 W. Lexington Avenue, Suite 200
Independence, MO 64051
jboyd@bktplaw.com

/s/Tara M. Kelly
Tara M. Kelly